

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

Jackson Pavelka, Kaylee Pavelka,	§	
Thomas Doughty, Jan Morton and	§	
David Morton, individual and on	§	
behalf of a class	§	CA No. 3:22-cv-74-B
	§	
Plaintiffs,	§	
v.	§	
	§	Class Action Complaint
Pelican Investment Holdings Group,	§	Jury Demanded
LLC d/b/a AAP, Affordable Auto	§	
Protection, LLC, and Gustav Renny	§	
	§	
Defendants.	§	

**PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE**

On January 24, 2023, Plaintiffs took the deposition of Gustav Renny on jurisdictional issues. On January 27, 2023, in Doc. 45, the Parties stipulated to the dismissal of all causes of action against Affordable Auto Protection, LLC, and Gustav Renny. This alleviated the need to file an Amended Complaint against Affordable Auto Protection, LLC, and Gustav Renny. Those were the only parties challenging the Court's jurisdiction.

The Court's Order dated August 8, 2022 (Doc. 35) found that Plaintiffs had sufficiently met their pleading burden with regard to Pelican Investment Holdings Group, LLC d/b/a AAP and denied its motion under Rule 12(b)(6) and its motion to strike class allegations under Rule 12(f).

Thus, no amended complaint is necessary with regard to Pelican Investment Holdings Group, LLC d/b/a AAP.

Plaintiffs desire to proceed with their causes of action against Pelican Investment Holdings Group, LLC d/b/a AAP as pled in their operative Complaint, Doc. 14. Plaintiffs do not request to file an amended complaint against Pelican Investment Holdings Group, LLC d/b/a AAP.

Plaintiffs' counsel is available to discuss with the Court, should the Court desire.

Respectfully submitted,

By: /s/ Chris R. Miltenberger  
Chris R. Miltenberger  
Texas Bar Number: 14171200

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**Attorney for Plaintiffs**

### **Certificate of Service**

The undersigned certifies that the foregoing document was filed electronically through the Court's CM/ECF system in compliance with the Local Rules.

By: /s/ Chris R. Miltenberger  
Chris R. Miltenberger